

**WILTSHIRE COUNCIL
COMMENTS ON THE HOLT NEIGHBOURHOOD PLAN FINAL DRAFT (JULY 2015)**

JANUARY 2016

Wiltshire Council is fully supportive of neighbourhood planning and has welcomed the opportunity to engage with Holt Parish Council and the Neighbourhood Plan Steering Group during the neighbourhood plan's preparation and commends them on the work that has gone into the production of their plan.

Although no formal consultation response from Wiltshire Council was provided during the Regulation 16 consultation on the above plan the following comments have been prepared in order to assist the examination and will be provided to the Examiner on their appointment.

The comments generally focus on general conformity with the Wiltshire Core Strategy and the effectiveness of the proposed policies in achieving their stated objectives through the determination of individual planning applications.

In terms of meeting the basic conditions work is currently being undertaken to ensure that the plan is supported by appropriate documentation with regard to Habitats Regulations Assessment so that this can be provided to the Examiner alongside the Plan.

Strategic Policy Context

The Wiltshire Core Strategy was formally adopted by Wiltshire Council on 20 January 2015. It provides a positive and flexible overarching planning policy framework for Wiltshire for the period up to 2026, including for the development of neighbourhood plans. As such, a number of the policies contained within the WCS are relevant to the Holt neighbourhood area and the draft Plan.

In addition to the policies within the Wiltshire Core Strategy, a number of policies from the former District Councils Local Plans, including the West Wiltshire District Plan 1st Alteration, June 2004 also relate to the area. The extant saved policies are set out in Appendix D of the Core Strategy.

Of particular relevance is the spatial strategy for the Bradford on Avon Community Area, within which Holt is located, as set out in the Wiltshire Core Strategy (Core Policy 7). This identifies specific issues to be addressed in planning for the area and indicative figures for the delivery of housing in the Bradford on Avon Community Area for the period 2006 to 2026.

Holt is identified in the Core Strategy as a Large Village. As set out in Core Policies 1 and 2, Large Villages are defined as settlements that have a limited range of employment, services and facilities where development is limited to that needed to help meet their housing need and improve employment opportunities, services and facilities. Core Policy 2 supports the delivery of housing in a sustainable pattern by prioritising the re-use of previously developed land to minimise development on Greenfield sites and taking a plan led approach to development outside of settlement boundaries.

Core Policy 7 identifies a local housing requirement for the Community Area over the plan period (2006 to 2026) of 'approximately 780 new homes'. This figure is split between housing to be identified at the market town of Bradford on Avon (about 595 dwellings) and housing to be identified in the rest of the community area, which equates to around 185. Table 5.2 gives a 'remainder to be identified' figure which discounts any completions or commitments already accounted for since the start of the plan period. The completions and

commitments data in Table 5.2 have been updated in the Council's latest Housing Land Supply Statement (September 2015), and the 'remainder' figure for Bradford on Avon Community Area is now 57¹. It is anticipated that much of the 'remainder' figures will be delivered at the Large Villages. Within Bradford on Avon Community Area there are three large villages, these being Holt, Westwood and Winsley. Westwood and Winsley are located within the Green Belt as such their potential to accommodate additional growth will be restricted.

In its approach to housing delivery the Core Strategy does not define precisely where remainder requirements should be delivered, which allows the flexibility for neighbourhood plans to allocate housing. Set in this context, the draft Plan seeks to allocate some land for the delivery of housing and employment at the village, although a specific quantum is not discussed in the Plan. At paragraph 1.3 the Plan acknowledges that development has taken place at the village since 2006, some of which is quite recent - in total from the Council's monitoring data 69 net additional homes have been built at the village over the period 2006 to 2015, with 3 dwellings outstanding.

In recognition of this growth, the Plan appears to respond to the development opportunities at Holt in the form of brownfield potential and making provision for additional affordable housing in the future.

Comments on the Draft Plan

Detailed plan / map of Holt (page 2)

The map appears to be a 'screenprint' from the West Wiltshire District Local Plan policies maps. As these maps were superseded on the adoption of the Wiltshire Core Strategy, the map would benefit from being updated and a new map created to reflect the policies within the Neighbourhood Plan. For example, this could include the Tannery and Star Ground sites.

A Vision for Holt (page 10)

The Plan sets a vision for Holt. However the sentence "*The village will have the same settlement boundary as now and will preserve the greenspaces within that boundary*" may benefit from review. Given that the Neighbourhood Plan does promote development in order to meet strategic development needs (in accordance with the requirements of the NPPG Paragraph: 044 Reference ID: 41-044-20140306 the vision could be phrased more positively in order to not appear as if the Plan is trying to prevent development.

Policy H1.1 Tannery Site (Page 19)

The allocation of the Tannery site for residential and employment uses in order to help deliver growth consistent with the Wiltshire Core Strategy is welcomed. However, it is unclear whether the proposed mix of uses 50% housing and 50% commercial is viable and achievable, and also how this split might be interpreted in practice. As such, the Plan would benefit from further clarification. For example, is it possible to identify how many units for housing should be delivered on site and what form the commercial development should take, will the development involve the re-use of buildings or be new build?

In terms of the delivery of affordable housing on site, this would need to be consistent with Core Policy 43 of the Wiltshire Core Strategy and in line with current demonstrable need. Overall 40% of affordable housing would be sought on site.

¹ The Housing Land Supply Statement, September 2015 is available from: <http://www.wiltshire.gov.uk/housing-land-supply-statement-2015-final.pdf>

With regard to criterion 3, the only ability the Council has to secure the mix of housing in terms of tenure (i.e. for sale and rent) is through affordable housing, it is not possible to do the same for open market housing.

The policy acknowledges the need to address site access which the council supports. However, consideration should be given to amending the plan to ensure a full Transport Assessment is required to support any planning application. Any Transport assessment should also consider traffic generation and assess the suitability of increased traffic movements at the Junction between 'the Midlands' and the B3107 due to limited site lines and concern with regard to on-street parking.

Policy H1.2 (Page 19)

Part (b) of the policy would benefit from reviewing to ensure that it achieves the intended outcome, which appears to be for the provision solely of affordable housing to meet an identified local need if required following development of the Tannery site. The intention of the policy in effect appears to be safeguarding land at the Star Ground off Station Hill Road for a rural exception site should it be needed consistent with Core Policy 44 of the Wiltshire Core Strategy that allows such sites to come forward for up to 10 dwellings. In the interest of clarity, it would be beneficial to identify what land is referred to in this part of the policy on a map.

Policy H1.3 (Page 19)

The procedure for setting out a mechanism / policy for the occupation of affordable housing is set out in the Housing Act 1996 and Wiltshire Council has an agreed Housing Allocation and Procedures policy that is in accordance with this Act. The Council therefore has an established allocations policy, which guides the allocation of all affordable housing in Wiltshire. The policy is available from: <http://www.wiltshire.gov.uk/new-allocation-2015-policy.pdf>. The criteria for local connection are at paragraph 4.13.2. Policy H1.3 is inconsistent with this and would be impractical to implement. By setting more stringent criteria the Policy could also undermine the delivery of affordable housing at the time planning applications are determined impacting on the ability of the needs identified in paragraph 1.2 of the draft Plan being met or future needs that may arise over the Plan period.

Policy H3.1e (Page 21)

The conversion of 2 smaller properties into 1 larger unit is now exempt from planning depending on the materiality of case and consideration should therefore be given to removing this from the plan.

Policy H3.3 (Page 21)

Core Policy 48 (supporting rural life) of the Wiltshire Core Strategy supports the conversion and re-use of rural buildings for employment, tourism, cultural and community uses where certain criteria are met and only allows residential conversion where there is clear evidence that the above uses are not practical propositions or justified in special circumstances. Core Policy 48 is consistent with paragraph 28 of the National Planning Policy Framework (NPPF), which encourages Local Plans and Neighbourhood Plans to support a prosperous rural economy. Policy H3.3 therefore appears to be contrary to both the Core Strategy and NPPF in its promotion for housing in the first instance.

Policy T1 (page 28/29)

The highway authority agrees in principle with the objective of improving safety and reducing the impact of traffic on the B3107. However, a number of the traffic management measures identified on the map on Page 28 are not felt to be appropriate. The primary function of a B class road is the movement of traffic and the B3107 does not meet the criteria for 20mph speed restrictions. In addition, a shared space treatment is not considered appropriate for the B3107 in Holt as there is not sufficient pedestrian activity for pedestrians to mix with traffic and secure priority over vehicles. In principle, improved gateways, traffic management measures, junction improvements and pedestrian crossings along the B3107 are acceptable. Consideration should therefore be given to removing the shared space and 20mph speed restriction from the map together with the removal of task T3.

Task T8, page 30

A freight study was recently conducted on the B3107 through Holt (covering the section of the B3107 between Bradford on Avon and Melksham) and the traffic counts and analysis showed that the proportion of the total traffic that is HGVs is approximately 2-3%. The data also indicated that the number of HGV through movements (i.e. those that do not have an origin or destination either on or in the vicinity of that section of the B3107) was 14 for the weekday average (approximately 1% of all through traffic movements). As such, the scope for diverting traffic away from the B3107 is extremely limited and a weight limit on the B3107 is not appropriate and consideration should be given to removal of Task 8.